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CERTIFICATE OF MAILING

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*David M. Green*  
Attorney for Applicant



PATENT

Docket No. CA920010055US1

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant:	Michael Priestley	)	
Serial No.:	09/927,103	)	
Filed:	August 10, 2001	)	
For:	LINK MANAGEMENT USING DOCUMENT	)	
	STRUCTURES	)	Group Art
Examiner:	Abel-Jalil, Neveen	)	Unit: 2165
		)	
		)	

APPEAL BRIEF

Mail Stop Appeal Brief-Patents  
Commissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22313-1450

Dear Examiner:

The USPTO received Appellant's timely Notice of Appeal on April 1, 2005, which was filed in response to the Final Office Action mailed December 8, 2004, and the Advisory Action mailed March 14, 2005. Appellant appeals the rejection of and objections to pending claims 1-21. This Appeal Brief is being filed under the provisions of 37 C.F.R. § 41.37. The filing fee set forth in 37 C.F.R. § 41.20(b)(2) of \$500.00 is submitted herewith. The Commissioner is hereby authorized to charge payment of any additional fees associated with this communication, or to credit any overpayment, to Deposit Account No. 09-0460.

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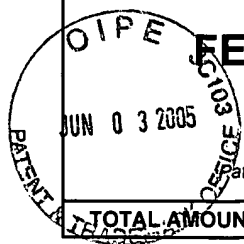
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PTO/SB/05 (12/97)

Approved for use through 9/30/05. OMB 0651-0032

Patent and Trademark Office: U.S. DEPARTMENT OF COMMERCE

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## FEE TRANSMITTAL

Note: Effective December 8, 2004.  
Patent fees are subject to annual revision.

### Complete If Known

Application Number	09/927,103
Filing Date	August 10, 2001
First Named Inventor	Michael Priestley
Group Art Unit	2165
Examiner Name	Neveen Abel-Jalil
Attorney Docket Number	CA920010055US1

TOTAL AMOUNT OF PAYMENT \$500

METHOD OF PAYMENT (check one)	FEE CALCULATION (continued)																																																																																																																																																																																																																																																																																																								
<p>1. <input checked="" type="checkbox"/> The Commissioner is hereby authorized to charge indicated fees and credit any over payments to:</p> <p>Deposit Account Number: <u>09-0460</u></p> <p>Deposit Account Name: <u>IBM CORPORATION</u></p> <p> <input checked="" type="checkbox"/> Charge Any Additional Fee Required Under 37 CFR 1.16 and 1.17           <input type="checkbox"/> Charge the Issue Fee In 37 CFR at the Mailing of the Notice of Allowance         </p> <p>2. <input type="checkbox"/> Payment Enclosed:</p> <p style="margin-left: 20px;"> <input type="checkbox"/> Check    <input type="checkbox"/> Money Order    <input type="checkbox"/> Other         </p>	<p><b>3. 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SUBMITTED BY				Complete (if applicable)	
Typed or Printed Name		David J. McKenzie		Reg. Number	46,919
Signature		<i>David J. McKenzie</i>		Deposit Account User ID	
Date		Jun 1, 2005			

Burden Hour Statement: This form is estimated to take 0.2 hours to complete. Time will vary depending upon the needs of the individual case. Any comments on the amount of time you are required to complete this form should be sent to the Chief Information Officer, Patent and Trademark Office, Washington, DC 20231

## **1. REAL PARTY IN INTEREST**

The real party in interest is the assignee, International Business Machines Corporation, Armonk, New York.

## **2. RELATED APPEALS AND INTERFERENCES**

There are no related appeals, interferences, or judicial proceedings.

## **3. STATUS OF CLAIMS**

The Final Office Action rejected Claims 1-21 and objected to Claims 4-6, 7/5, 11-13, 14/12, 18-20, and 21/19. Claims 1-3, 7/3, 8-10, 14/10, 15-17, and 21/17 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,718,329 B1 to Selvin et al. (hereinafter "Selvin") in view of U.S. Patent No. 6,750,883 B1 to Parupudi et al. (hereinafter "Parupudi"). Claims 4-6, 7/5, 11-13, 14/12, 18-20, and 21/19 were objected to, but found allowable if amendments were made to overcome the rejections to the respective independent and intermediate claims.

According to the Advisory Action mailed March 14, 2005, the claims remain rejected and objected to as set forth in the final rejection. The Advisory Action asserts that the arguments presented in the request for reconsideration mailed February 28, 2005 are unpersuasive. Appellant appeals the rejection of Claims 1-21 and the objection to Claims 4-6, 7/5, 11-13, 14/12, 18-20, and 21/19.

## **4. STATUS OF AMENDMENTS**

Appellant did not propose amendments in the request for reconsideration mailed February 28, 2005.

## **5. SUMMARY OF CLAIMED SUBJECT MATTER**

The claimed subject matter deals with performing link management for units of information such as web pages, help files, and the like. See Spec. page 1, lines 4-5. Specifically,

the claimed invention links units of information together based on a hierarchy encoded in a listing of identifiers. See Spec. page 4, lines 21-27.

The problem addressed is facilitating rapid creation of links between a collection of units of information, such as a collection of web pages. See Spec. page 1, lines 7-13. One conventional tool for inter-linking units of information relies on a user to manually add, delete, or modify links between units of information. See Spec. page 2, lines 7-9. Manually inter-linking large numbers of units of information is inconvenient and difficult. See Spec. page 2, lines 12-20. Another conventional tool for inter-linking units of information uses a compiler to read programmed instructions for inter-linking the units of information. See Spec. page 2, lines 21-28. A developer proficient in a computer programming language creates the programmed instructions. See Spec. page 4, lines 3-6. When new units of information are added to a collection, the developer changes the programmed instructions to create links to the new units of information. See Spec. page 3, lines 20-24. This tool requires the developer to become proficient in creating programmed instructions, which may be inconvenient and costly. See Spec. page 4, lines 3-19.

Embodiments of the present invention include a method, a system, and a computer program product for performing link management of document structures.<sup>1</sup> See e.g. Claims 1, 8, and 15. The system of Claim 1 includes means for storing a list of identifiers, examining the identifiers, and linking a unit of information to at least one other unit of information based on the relative hierarchical order of at least two identifiers. See Fig. 3.

The following references are illustrative of an embodiment of the system of Claim 1. A link manager reads the list of identifiers to determine a hierarchical relationship between identifiers and the units of source information the identifiers represent. See Spec. page 9, lines 18-20. The link manager then generates units of target information including content from a unit of source information and one or more links to other units of target information. See Fig. 4 and Spec. page 9, lines 24-25 and page 10, lines 1-2. .

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<sup>1</sup> Although Appellant has summarized embodiments of the present invention, the present invention is defined by the claims themselves. Appellant's summary is not intended to limit the scope of the claims or individual claim elements in complying with the appeal brief requirements under 37 C.F.R. § 41.37(c)(v).

Figures 5A and 5B illustrate the generation of units of target information 512A-512G from units of source information 502A-502J based on a list of identifiers 508A-508G. In one embodiment, a listing 604 stores a list of identifiers in a hierarchy based on the relative nesting and order of the identifiers. See Fig. 6. Figure 6 illustrates that the listing 604 is a human readable structure that is separate and distinct from the source information 602 and the target information 608. Units of target information 608 comprise the content of units of source information 602 and links to other units of target information. The system uses the relative nesting and order of the identifiers in the listing 604 to determine how the units of target information are linked. See Figs. 7-8. Flow chart diagrams 900 and 920 illustrate how the system determines a relationship between identifiers and uses the relationship to generate a unit of target information. See Figs. 9A and 9B.

Claims 8 and 15 include substantially the same subject matter as that described above in relation to Claim 1. Regarding the computer program product of Claim 15, computer readable program code directs the creation and management of links between units of information based on a list of identifiers arranged in hierarchical order. The computer program product implements storing identifiers, examining identifiers to determine the hierarchical order of the identifiers, and linking a unit of target information to at least one other unit of target information based on the relative hierarchical order of the identifiers. See Spec. page 5, lines 23-28 and page 6, lines 1-6.

Additionally, an embodiment of the present invention includes a system claimed in means plus function format under 35 U.S.C. § 112, sixth paragraph. Examples of the structure, material, or acts corresponding to the means recited in claims 1, 2, 4, and 6 are referenced below.

With regard to Claim 1, the memory 320 is one example of the means for storing a list of identifiers. See Fig. 3; Spec. page 8, line 7. Document Object Model APIs are one example of the means for examining the list of identifiers to determine the hierarchical order of the identifiers within the list of identifiers. See Spec. page 8, lines 7-10. Hypertext links are one example of the linking means. See Spec. page 8, lines 10-13.

With regard to Claims 2 and 4, a mechanism having discreet electronic/electrical components or hardware is one example of the generating means, the examining means, and the insertion means. See Spec. page 9, lines 6-12. A mechanism comprising computer coded software instructions or modules is another example of the generating means, the examining

means, and the insertion means. See Spec. page 9, lines 6-13. A mechanism comprising a hybrid system having some hardware and some software modules is a further example of the generating means, the examining means, and the insertion means. See Spec. page 9, lines 6-15.

The claimed invention provides a simple, flexible, way of linking units of information together based on a user determined hierarchy encoded in an explicit listing of identifiers. The user may impose a hierarchy within the list of identifiers by using simple identifier arrangements such as indentations, adjacent locations, and tables. A user may easily manipulate the listing since the listing may be a simple text file similar to the listing 506 illustrated in Fig. 5A, the HTML or XML listing 604 illustrated in Fig. 6, or the simple HTML table listing 1004 illustrated in Figure 10. See Figs. 5A, 6, 10; Spec. page 10, lines 8-14, page 12, lines 18-24, page 16, lines 24-28.

A user may alter the way units of information are linked by simply editing the listing. For example, as a result of indenting a first identifier and not indenting a second identifier within a listing, a parent/child link may be created so that the unit of information represented by the indented identifier is a child to the unit of information represented by the identifier not indented. See Spec. page 11, lines 20-27. A user could easily modify the relationship between the units of information to be a previous/next relationship rather than a parent/child relationship by simply editing the listing to remove the indentation of the first identifier.

Editing a simple list of identifiers allows a user to rapidly create or modify links between units of information. This is a significant improvement over conventional approaches that require manual linking or learning programming languages. See Spec. page 4, line 17 and page 5, lines 1-4.

## **6. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL**

I. Whether the Examiner failed to establish a *prima facie* case of obviousness under 35 U.S.C. § 103(a) for Claims 1-3, 7/3, 8-10, 14/10, 15-17, and 21/17 where the limitations of the claims are not taught or suggested within the combination of cited references and no motivation to make the combination exists.

## 7. ARGUMENT

I. The Examiner failed to establish a *prima facie* case of obviousness under 35 U.S.C. § 103(a) because the cited references, either alone or in combination, do not teach or suggest all of the limitations of claims 1-3, 7/3, 8-10, 14/10, 15-17, and 21/17 and no motivation to make the combination exists.

### INDEPENDENT CLAIMS 1, 8, and 15

#### A. Independent Claims 1, 8, and 15

Appellant respectfully submits that independent Claim 15 is representative of the patentable subject matter of Claims 1 and 8. Appellant further submits that Claim 15 is non-obvious in view of Selvin and Parupudi. Claim 15 states:

A computer program product for use in a computer system operatively coupled to a computer readable memory, the computer program product including a computer-readable data storage medium tangibly embodying computer readable program code for directing said computer to create and manage links amongst units of information based on a list of identifiers arranged in an hierarchical order wherein each identifier identifies an associated unit of information, said computer program product comprising:

- code for instructing said computer system to store said list of identifiers, wherein said list of identifiers has a user determined relative hierarchical order to direct a link management system in the creation of said links;
- code for instructing said computer system to examine said list of identifiers to determine the hierarchical order of said identifiers within said list of identifiers;
- code for instructing said computer system to link a unit of information to at least one other unit of information based on the relative hierarchical order of identifiers including:
  - an identifier identifying said unit of information; and
  - another identifier identifying said at least one other unit of information.



B. The Rejection under 35 U.S.C. § 103(a)

The Advisory Action mailed March 14, 2005 maintains the final rejection under 35 U.S.C. § 103(a) as set forth in the Final Office Action mailed December 8, 2004. The Advisory Action asserts that the arguments presented in the request for reconsideration mailed February 28, 2005 are unpersuasive. The Final Office Action, mailed December 8, 2004, states:

As to claims 1, 8, and 15, Selvin et al. discloses a computer program product for use in a computer system operatively coupled to a computer readable memory, the computer program product including a computer-readable data storage medium tangibly embodying computer readable program code for directing said computer to create and manage links amongst units of information based on a list of identifiers arranged in an hierarchical order wherein each identifier identifies an associated unit of information (See Selvin et al. column 3, lines 7-50, also see Selvin et al. figure 6, step 602), said computer program product comprising:

code for instructing said computer system to examine said list of identifiers to determine the hierarchical order of said identifiers within said list of identifiers (See Selvin et al. column 11, lines 41-67);

code for instructing said computer system to link a unit of information to at least one other unit of information based on the relative hierarchical order of identifiers (See Selvin et al. column 3, lines 7-50) including;

an identifier identifying said unit of information (See Selvin et al. column 4, lines 20-57, and see Selvin et al. column 9, lines 1-45); and

another identifier identifying said at least one other unit of information (See Selvin et al. column 9, lines 1-46).

Selvin et al. does not teach code for instructing said computer system to store said list of identifiers, wherein said list of identifiers has a user determined relative hierarchical order to direct said link management system in the creation of said links.

Parupudi et al. teaches code for instructing said computer system to store said list of identifiers, wherein said list of identifies has a user determined relative hierarchical order to direct said link management system in the creation of said links (See Parupudi et al. column 14, lines 3-45).

See Final Office Action, 12/08/2004, pp. 2-3.

C. Withdrawal of the Rejection under 35 U.S.C. § 103(a)

Applicant respectfully disagrees with the Office Action's characterization of the cited reference. As described immediately below, neither Selvin nor Parupudi describe a list of identifiers having a user determined relative hierarchical order or examination of such a list for determining a hierarchical order of the identifiers.

Selvin, in general, is directed toward the generation of nodes and link definitions for a hypertext database. Selvin, Abstract. More particularly, Selvin teaches a source document segmented into nodes. Selvin, col. 2, lines 35-36 and col. 5, lines 18-20. A node is a portion of the source document comprising data. Selvin, col. 4, lines 58-60. A node may be further divided into fields where each field is a portion of a node. Selvin, col. 2, lines 55-67. Nodes may be arranged within the source document in a “logical” structure as defined by format properties such as format codes. Selvin, col. 2, lines 37-40 and col. 2, lines 43-46. Consequently, the structure both hierarchy and order is inherent in the source document. The structure is integrated with the source document. The structure and the source document are dependent on each other.

Link definitions are created to establish associations between nodes. Selvin, col. 2, lines 37-38. The link definitions preserve “the logical or hierarchical relationship of the content of the *source documents*.” Selvin, col. 3, lines 7-11 (emphasis added). Nodes are associated, or linked together “based on the logical structure or hierarchy of the nodes as defined by the format properties of the source document.” Selvin, col. 11, lines 60-63. Here again, Selvin indicates that the hierarchy is defined within the source document, not within a separate list of identifiers. Furthermore, certain format properties of the source document are hidden. Selvin, col. 10, lines 24-25.

In contrast, the claimed invention teaches a list of stored identifiers arranged in a “user determined relative hierarchical order.” See Claim 1. Identifiers are names or titles for units of information and are easy to identify and recognize. Each identifier is distinct and separate from the unit of information that the identifier identifies. See Figure 6. The identifiers are stored separately from the units of information, instead of as format properties within the source document as in Selvin. The list of identifiers may be drafted by a user. See Claim 1.

This separation of identifier and unit of information facilitates organization and layout of the identifiers. Preferably, the list of identifiers may be presented in a human readable format that permits ready understanding of the hierarchy and organization that will be applied to the associated units of information. The claimed invention links a unit of information to at least one other unit of information based on the relative hierarchical order of the identifiers within the distinct list of identifiers. See Claim 1. Furthermore, having a separate list of identifiers in

human readable format permits the user to quickly revise the list in order to change the hierarchy that will be applied to the units of information.

Selvin fails to teach identifiers having a user determined relative hierarchical order. An identifier is distinct from the unit of information it identifies. See Claim 1. Nodes in Selvin are portions of a source document. Selvin, col. 5, lines 21-22. A node does not identify a unit of information, a node is a unit of information. In contrast, an identifier, according to the claimed invention, is distinct from the unit of information it identifies. Spec. page 5, line 7.

Format codes, as taught by Selvin, are not identifiers since they do not identify a single unit of information. Selvin teaches that a single format code, such as a “bold format code” or a “paragraph format code,” can be used to identify more than one node. Selvin, col. 4, lines 35-57. Therefore, a single format code will not unambiguously identify a unit of information or node. The single format code requires the source document in order to provide the association between a single format code and a node of the document.

The format code and its associated node are embedded within the source document. Selvin, col. 4, lines 35-41. Consequently, to revise or reorganize the hierarchy, a user in Selvin would have to alter the source document. The user may prefer to have the hierarchy changed without changing the source documents. Selvin does not permit this. In contrast, when revising the hierarchy using the present invention, the list of identifiers is changed, not the units of information.

Selvin fails to teach a distinct, explicit list of identifiers. A list of format properties is not a list of identifiers since format properties are spread out in a plurality of source documents rather than being stored in a distinct, explicit list separate from a source document. Selvin, col. 4, lines 34-40. In addition, format properties are not explicit. For example, Selvin teaches that some properties codes may be hidden from a user. Selvin, col. 10, lines 20-25.

Selvin teaches that a user can draft a source document which may inherently have format properties which may or may not be in a hierarchy. Selvin, col. 4, lines 19-57. However, the user is likely unaware of the hierarchy since the user does not necessarily know which format codes are used to create links. In fact, the user may not be able to see some format codes, and thus will be unaware of the place in the hierarchy that a node may have based on the hidden format code. Selvin, col. 10, lines 19-25. Consequently, the hierarchical organization in Selvin

is not be readily apparent from the source document. In this manner, Selvin shields the user from the hierarchy. In order to have the same level of understanding of the hierarchy in Selvin, as in the present invention, a user would have to learn the special coding used by Selvin to define the hierarchy. The user would also have to learn how to identify the Selvin codes. This is one of the problems the present invention overcomes. See Spec. page 4, line 17 and page 5, lines 1-4.

Selvin fails to teach code for instructing a computer system to examine a list of identifiers to determine the hierarchical order. Since Selvin fails to teach a list of identifiers having a user determined relative hierarchical order, Selvin fails to teach identification of hierarchical order using this list. In contrast, the claimed invention allows a user to edit a simple listing of identifiers, contained in a text file, HTML file, or the like, to create a hierarchy among identifiers. See Figs. 5A, 6, 10; Spec. page 10, lines 8-14, page 12, lines 18-24, page 16, lines 24-28. Editing a simple list of identifiers allows a user to rapidly create or modify links between units of information. This is a significant improvement over conventional approaches that require manual linking or learning programming languages. See Spec. page 4, line 27 and page 5 lines 1-4.

Instead, Selvin teaches linking nodes “based on the logical structure or hierarchy of the nodes as defined by the format properties of source document 60.” Selvin, col. 11, lines 60-63. Linking based on an internal hierarchy of nodes is not linking based on an identifier list having a user determined relative hierarchical order. The hierarchical order of Selvin is not readily apparent or available to the user in an editable format. Instead, the user must decipher the format properties of the source document and change the source document to affect the hierarchical order.

In contrast, the claimed invention teaches use of a simple list of identifiers with a user defined hierarchy to link unit documents. See Spec. page 4, lines 21-24. Consequently, a user can quickly and readily determine how to subsequently change links between units of information. It would be extremely difficult for a user of Selvin to alter links in a source document without knowledge of the format properties Selvin uses to segment a source document. Selvin shields the user from having to know format properties by automatically determining a hierarchy, rather than deferring to a user determined hierarchy.

The examiner acknowledges that Selvin fails to teach storing a list of identifiers having a user determined relative hierarchical order to direct a management system in the creation of links. The examiner asserts that Parupudi teaches storing a list of identifiers having a user determined relative hierarchical order to direct a management system in the creation of links. Applicant respectfully disagrees with the Examiner's conclusion.

Parupudi teaches a "secondary world that includes a list of entities" but fails to teach storing the list. Parupudi, col. 14, lines 13-14. Even if the "list of entities" was stored, the "list of entities" is not a list of **identifiers** having a user determined relative hierarchical order since an entity is not an identifier. Parupudi teaches that a "node[]" constitutes a physical or logical entity." Parupudi, col. 14, lines 4-5. As discussed above, a node/entity is not an identifier because a node/entity does not identify a unit of information; a node/entity *is* a unit of information. Furthermore, the "list of entities" is not used by Parupudi to create links linking the nodes. Rather, the list of entities describes links between nodes existing before the list of nodes is created. Parupudi, col. 14, lines 12-48.

The "list of entities" taught by Parupudi describes nodes within a "Secondary World." Parupudi, col. 14, lines 13-14. Parupudi does not teach that the "list of entities" is user determined, explicit, editable, or readable. Parupudi does not use the "list of entities" in the creation of links since the only link taught by Parupudi is a link between a "Master World" and a "Secondary World" and the "Master World" is not included in the "list of entities." Parupudi does not address linking of nodes within a secondary world. Parupudi, col. 13, lines 63-65.

Under 35 U.S.C. §103 the Examiner has the initial burden of presenting a *prima facie* case of obviousness. In re Rijckaert, 28 U.S.P.Q.2d 1955, 1956 (Fed. Cir. 1993). To establish a *prima facie* case of obviousness, the combination of the prior art references must teach or suggest all the claim limitations. MPEP § 2142. In addition, "it is insufficient that the prior art disclosed the components of the patented device, either separately or used in other combinations; there must be some teaching, suggestion, or incentive to make the combination made by the inventor." *Northern Telecom, Inc. v. Datapoint Corp.*, 908 F.2d 931, 934 (Fed. Cir. 1990).

### Combination of Selvin and Parupudi fail to teach or suggest all claim elements

Neither the Selvin nor Parupudi teach or suggest combining concepts found in each or the desirability of such a combination. As “[t]he teaching or suggestion to make the claimed combination ... must be found in the prior art, not in applicant's disclosure,” MPEP 2143, citing *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991), Appellant submits that Selvin and Parupudi fail in combination or alone to provide the requisite motivation to combine teachings of each to make a *prima facie* case of obviousness.

The examiner asserts that the combination is obvious because Parupudi teaches a “means to modulate the information that is provided for various applications.” See Final Office Action, 12/08/2004, p. 4. Parupudi teaches a device that controls, or modulates, how much information the device provides to a requesting application based on the identity of the requesting application and on security policies. Parupudi, col. 25, lines 38-45.

The Examiner asserts that a device capable of modulating information based on an identity suggests that storing a list of identifiers, the element of the claimed invention the Examiner asserts is taught by Parupudi, should be combined with the hypertext database of Selvin. However, the device that modulates information is not related to storing a list of identifiers. Parupudi teaches that modulation is performed by a privacy manager. Parupudi, col. 24, lines 11-12. The privacy manager does not use a “list of entities” to modulate the information returned to the application. Instead, the privacy manager uses privacy levels. See Parupudi, col. 24, lines 20-30. Privacy levels also are not a list of identifiers. The device has access to a secondary world, but does not use the “list of entities” associated with the secondary world to make a decision regarding allowing an application access to information.

Applicant asserts that there is simply no motivation to combine Selvin and Parupudi based upon the teaching of a context aware computing environment including information modulation to adhere with security policies (Parupudi) and the teaching for generating a hypertext database to mirror the logical structure of one or more source documents (Selvin).

### DEPENDENT CLAIMS 2-3, 7/3, 9-10, 14/10, 16-17, and 21/17

Given that claims 2-3, 7/3, 9-10, 14/10, 16-17, and 21/17 depend from one of independent claims 1, 8, or 15 which are believed to be patentable as described above, Appellant

respectfully submits that the rejection of claims 2-3, 7/3, 9-10, 14/10, 16-17, and 21/17 under 35 U.S.C. § 103(a) is moot. Accordingly, Appellant requests that the rejection of dependent claims 2-3, 7/3, 9-10, 14/10, 16-17, and 21/17 under 35 U.S.C. § 103(a) be duly withdrawn.

DEPENDENT CLAIMS 4-6, 7/5, 11-13, 14/12, 18-20, and 21/19

Given that claims 4-6, 7/5, 11-13, 14/12, 18-20, and 21/19 depend from one of independent claims 1, 8, or 15 which are believed to be patentable as described above, Appellant respectfully submits that claims 4-6, 7/5, 11-13, 14/12, 18-20, and 21/19 are allowable without any amendments to the independent claims.

Given that Selvin and Parupudi fail to teach or suggest a motivation to combine the teachings each reference or all of the elements recited in the independent claims 1, 8, and 15 of the present application, Applicant respectfully submits that claims 1-21 are patentable over Selvin and Parupudi. Applicant requests that the rejection of claims 1-3, 7/3, 8-10, 14/10, 15-17, and 21/17 under 35 U.S.C. § 103(a) be withdrawn.

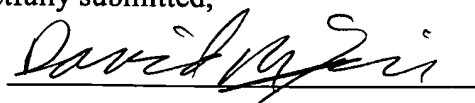
**SUMMARY**

In view of the foregoing, each of the claims on appeal has been improperly rejected because the Examiner has not properly established a *prima facie* case of obviousness for Claims 1-3, 7/3, 8-10, 14/10, 15-17, and 21/17. Appellant submits that the foregoing arguments establish the non-obviousness of the claims of the present application. Therefore, Appellant respectfully requests reversal of the Examiner's rejection under 35 U.S.C. § 103(a) and allowance of pending claims 1-21. Accordingly, Appellant submits that claims 1-21 are patentable.

Respectfully submitted,

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## 8. CLAIMS APPENDIX

The claims involved in the appeal, namely claims 1-21, are listed below.

1. A link management system for creating links amongst units of information based on a list of identifiers arranged in an hierarchical order wherein each identifier identifies an associated unit of information, said system comprising:

means for storing said list of identifiers, wherein said list of identifiers has a user determined relative hierarchical order to direct said link management system in the creation of said links;

means for examining said list of identifiers to determine the hierarchical order of said identifiers within said list of identifiers;

means for linking a unit of information to at least one other unit of information based on the relative hierarchical order of identifiers including:

an identifier identifying said unit of information; and

another identifier identifying said at least one other unit of information.



2. The link management system of claim 1 wherein:

said units of information are units of target information;

each said identifier of said list of identifiers is adapted to identify source

information content of a unit of source information;

the system further comprises:

means for generating said units of target information;

means for examining said list of identifiers to identify said source

information content assigned to a unit of target information;

and

means for inserting said source information content into a unit of

target information based on the identifier of said unit of

target information identifying said source information

content.

3. The link management system of claim 2 wherein a plurality of source information content is assigned to a unit of target information.

4. The link management system of claim 1 wherein:

said units of information are units of target information;

each said identifier of said list of identifiers is adapted to identify source

information content of a unit of source information assigned to a unit of

target information;

said list of identifiers further comprises:

a first subset of identifiers for identifying said units of target information to be generated by said system, said first subset hierarchically ordered to indicate preferred linking of said units of target information;

a second subset of identifiers for identifying said source information content to be inserted into said units of target information identified by said first subset of identifiers;

said means for linking is adapted to link a unit of target information to at least one other unit of target information based on the relative hierarchical order of identifiers including:

an identifier of said first subset for identifying said unit of target information;

at least one other identifier of said first subset for identifying said at least one other unit of target information; and

said system further comprises:

means for generating said units of target information; and

means for inserting at least one source information content into a unit of target information based on an identifier of said second subset identifying said at least one source information content.

5. The link management system of claim 4 wherein said list of identifiers further includes a third subset of identifiers for identifying links for inter-linking units of target information.

6. The link management system of claim 5 wherein the means for linking is adapted to inserting URL links.

7. The link management system of claims 3 or 5 wherein said identifiers of said list are data tags of a markup language.

8. A method performed on a computer system operationally coupled to computer readable memory for storing a list of identifiers, and said method for creating and managing links amongst units of information based on said list of identifiers arranged in an hierarchical order wherein each identifier identifies an associated unit of information, said method comprising the steps of:

storing said list of identifiers, wherein said list of identifiers has a user determined

relative hierarchical order to direct a link management system in the

creation of said links;

examining said list of identifiers to determine the hierarchical order of said

identifiers within said list of identifiers;

linking a unit of information to at least one other unit of information based on the

relative hierarchical order of identifiers including:

an identifier identifying said unit of information; and

another identifier identifying said at least one other unit of  
information.

9. The method of claim 8 wherein:

said units of information are units of target information;

each said identifier of said list of identifiers is adapted to identify source  
information content of a unit of source information;

the method further comprising the steps of:

generating said units of target information;

examining said list of identifiers to identify said source information  
content assigned to a unit of target information; and

inserting said source information content into a unit of target  
information based on the identifier of said unit of target  
information identifying said source information content.

10. The method of claim 9 wherein a plurality of source information content is  
assigned to a unit of target information.

11. The method of claim 8 wherein:

said units of information are units of target information;

each said identifier of said list of identifiers is adapted to identify source  
information content of a unit of source information assigned to a unit of  
target information;

said list of identifiers further comprises:

- a first subset of identifiers for identifying said units of target information to be generated by said system, said first subset hierarchically ordered to indicate preferred linking of said units of target information;

- a second subset of identifiers for identifying said source information content to be inserted into said units of target information being identified by said first subset of identifiers;

said step of linking is adapted to link a unit of target information to at least one other unit of target information based on the relative hierarchical order of identifiers including:

- an identifier of said first subset for identifying said unit of target information;

- at least one other identifier of said first subset for identifying said at least one other unit of target information; and

said method further comprising the steps of:

- generating said units of target information; and

- inserting at least one source information content into a unit of target information based on an identifier of said second subset identifying said at least one source information content.

12. The method of claim 11 wherein said list of identifiers further includes a third subset of identifiers for identifying links for inter-linking units of target information.

13. The method of claim 12 wherein the step of linking is adapted to inserting URL links.

14. The method of claims 10 or 12 wherein said identifiers of said list are data tags of a markup language.

15. A computer program product for use in a computer system operatively coupled to a computer readable memory, the computer program product including a computer-readable data storage medium tangibly embodying computer readable program code for directing said computer to create and manage links amongst units of information based on a list of identifiers arranged in an hierarchical order wherein each identifier identifies an associated unit of information, said computer program product comprising:

code for instructing said computer system to store said list of identifiers, wherein  
said list of identifiers has a user determined relative hierarchical order to  
direct a link management system in the creation of said links;  
code for instructing said computer system to examine said list of identifiers to  
determine the hierarchical order of said identifiers within said list of  
identifiers;

code for instructing said computer system to link a unit of information to at least one other unit of information based on the relative hierarchical order of identifiers including:

an identifier identifying said unit of information; and

another identifier identifying said at least one other unit of information.

16. The computer program product of claim 15 wherein:

said units of information are units of target information;

each said identifier of said list of identifiers is adapted to identify source information content of a unit of source information;

said computer program product further comprises:

code for instructing said computer system to generate said units of target information;

code for instructing said computer system to examine said list of identifiers to identify said source information content assigned to a unit of target information; and

code for instructing said computer system to insert said source information content into a unit of target information based on the identifier of said unit of target information identifying said source information content.

17. The computer program product of claim 16 wherein a plurality of source information content is assigned to at least one unit of target information.

18. The computer program product of claim 15 wherein:
- said units of information are units of target information;
  - each said identifier of said list of identifiers is adapted to identify source information content of a unit of source information assigned to a unit of target information;
  - said list of identifiers further comprises:
    - a first subset of identifiers for identifying said units of target information to be generated by said system, said first subset hierarchically ordered to indicate preferred linking of said units of target information;
    - a second subset of identifiers for identifying said source information content to be inserted into said units of target information being identified by said first subset of identifiers;
  - said code for instructing said computer system to link is adapted to link a unit of target information to at least one other unit of target information based on the relative hierarchical order of identifiers including:
    - an identifier of said first subset for identifying said unit of target information;
    - at least one other identifier of said first subset for identifying said at least one other unit of target information; and
  - said computer program product further comprises:



code for instructing said computer system to generate said units of target information; and  
code for instructing said computer system to insert at least one source information content into a unit of target information based on an identifier of said second subset identifying said at least one source information content.

19. The computer program product of claim 18 wherein said list of identifiers further includes a third subset of identifiers for identifying links for inter-linking units of target information.

20. The computer program product of claim 19 wherein said code for instructing said computer system to link is adapted to inserting URL links.

21. The computer program product of claims 17 or 19 wherein said identifiers of said list are data tags of a markup language

## **9. EVIDENCE APPENDIX**

There is no material to be included in the Evidence Appendix.

## **10. RELATED PROCEEDINGS APPENDIX**

There is no material to be included in the Related Proceedings Appendix.